

**To:** File

**Through:** David Harley, Ground Water *DH*  
Jerry Williams, Technical Division *JW*  
Joe Hoover, Enforcement Division  
Mike Bates, Chief  
Sam McMullen, Air

**From:** Phillip Murphy

**Date:** December 12, 1991

**Regarding:** Cedar Chemical Site Visit

David Hartley and I visited Cedar Chemical in West Helena on December 11, 1991 to see the SWMUs identified in the facility investigation preliminary report submitted in compliance of a CAO. The report was submitted in October, 1991. David and I were escorted by Mr. John Wagner, Environmental Engineer, of Cedar Chemical while we were on-site.

The first SWMUs visited during the visit was the wastewater treatment area. The wastewater treatment area consists of the equalization basin, aeration basin, clarifier, API separator, and the polishing pond.

The wastewater enters the wastewater treatment area via an underground sewer. Sam McMullen of the air division investigated a complaint, No. 78CO118, about odors from Cedar (then called Eagle River Chemical Company) on 6-12-78. The investigation revealed a broken process sewer line between the plant and the wastewater treatment area. Mr. McMullen stated in the investigation report that the process wastewater was diverted into a "reserve oxidation pond". During an interview with Mr. McMullen On December 12, 1991, Mr. McMullen stated the "reserve oxidation pond" was an area to the west of the wastewater treatment area with man-made levees. Mr. McMullen identified an area west of the wastewater treatment area as the "reserve oxidation pond" from an aerial photograph taken by Arkansas Highway Department on 10/3/79. Aerial photograph taken by Arkansas Highway Department on 11/30/74 indicate storm water from the plant drained into the area where "reserve oxidation pond" existed. According to Mr. Wagner, the "reserve oxidation pond" has been declared a wetland by the Corps of Engineers. Cedar will be requested to investigate the "reserve oxidation pond" and the underground process sewer during the RFI.

The wastewater is treated in an API separator. There was a large oil stain entering a ditch that flowed beside the wastewater treatment area. Mr. Wagner stated the discharge from the oil and water separator had occurred more than once. A complaint has been filed with the NPDES section for such releases. Cedar will be requested to investigate releases from the API separator during the RFI.

The sludge and the organic layer from the API separator is pumped into the equalization basin. Mr. Wagner stated there was no analysis of the sludge or organic layer. Cedar will be requested to perform a constituent and a TC analysis of the sludge and the organics from the API separator.

A fiberglass tank was located by the compressor house in the wastewater treatment area. Mr. Wagner stated process waste from the propanil process was fed into the wastewater treatment plant. Mr. Wagner stated the tank had leaked. Cedar will be required to test soils around the fiberglass tank in the RFI.

After the wastewater leaves the API separator, the water enters the wastewater treatment basins. There was a strong organic odor emanating from the wastewater treatment area. Cedar will be requested to provide air monitoring around the wastewater treatment area during the RFI. Cedar will be requested to perform a TC analysis of the sludge generated in the wastewater treatment area.

The next area investigated was the storm water pond. At the time of the visit, the storm water pond was heavily silted. According to the NPDES permit, Cedar must retain the first 100,000 gallons of storm water run off. Judging from the condition of the pond, there is no way that Cedar can meet the NPDES permit. NPDES has been advised of the condition of the storm water pond. Mr. Wagner stated a Toxic Reduction Evaluation (TRE) was required by NPDES due to acute toxicity of the storm water run-off to daphnia and fathead minnows. Cedar will be required to analyze the sediment in the ditch that receives the storm water run-off in the RFI.

Mr. Wagner stated the storm water pond had been dredged on two occasions. The dredge material from the storm water pond was disposed of as fill around the storm water pond. Mr. Wagner also stated a broken pipe with unknown material in the pipe was found in the storm water area. Cedar will be required to investigate the soils around the storm water pond.

The storm water ditches leading to the storm water pond were coated with a black oily organic. Cedar will be required to expand the soil sampling in the ditches in the RFI.

The whole facility had extensive yellow staining of the soils. One of the products previously manufactured at Cedar was Dinoseb, 2-(1-methylpropyl)-4,6-dinitrophenol. Dinoseb has a hazardous waste identification number of P020. The salts of dinoseb are an azo compound. Azo compounds are widely used as dyes. Yellow stained areas are probably contaminated with Dinoseb salts. Cedar proposes in the workplan to sample only random sites of the yellow stained soils. The NOD will required Cedar to sample all of the yellow stained areas. The NOD will also request the yellow stained areas be clearly indicated on site maps.

Cedar has two closed impoundments located on-site. The impoundments were closed by filling with soil. An organic odor was observed when we entered the area around the closed impoundments.

We walked under the process units to observe the condition of the concrete sumps and ditches under the process units. Generally, the concrete under the units was cracked. It was also obvious the concrete was chemically deteriorated by condensate and chemicals. Cedar will be required to investigate possibility of releases from the process areas.

Evidence of spills were observed close to TD-204. A tank marked waste acid had a hose connected to the tank. At the end of the hose, a black stain was observed. One of the tanks had sulfuric acid stenciled to the side of the tank. Sulfuric acid turns black when exposed to air. A puddle was observed to have an organic phase in the water. The surface of the mud puddle had a black oily areas on the surface.

The waste oil drum, SWMU 51, and the drum crushing area, SWMU 47, were SWMUs identified as needing further investigation in the RFA EPA performed in 1988 but were not observed during the site visit. According to Cedar personnel, these facilities do not exist at this time.